



EPSTEIN SACKS PLLC
ATTORNEYS AT LAW
100 LAFAYETTE STREET - SUITE 502
NEW YORK, N.Y. 10013
(212) 684-1230
Fax (212) 571-5507

BENNETT M. EPSTEIN: (917) 653-7116
SARAH M. SACKS: (917) 566-6196

April 21, 2023

Hon. Alison J. Nathan
United States Circuit Judge
Second Circuit Court of Appeals
United States District Court
40 Foley Square
New York, NY 10007

Filed on ECF

Re: *United States v. Alejandro Paulino*
19 Cr. 607 (AJN)

Dear Judge Nathan:

We represent the defendant, Alejandro Paulino, pursuant to the Criminal Justice Act. He has been on post release supervision since October 21, 2020, when Your Honor sentenced him for his participation in a bank fraud conspiracy. We write to seek the Court's permission for him to travel to the Dominican Republic on May 14, 2023, for a two-week period.

Alejandro, who is a U.S. citizen, asks to take this trip so that he can visit his family who still live in the Dominican Republic where he is from, including grandmother with whom he is close. As the Court may recall from our sentencing submission, she has not been in good health. Alejandro traveled to the D.R. last year while on post-release supervision (with the Court's permission) and returned to continue his supervision without incident. Probation has no objection to this request and the Government takes no position.

We also share with the Court that Alejandro continues to work legally, as he has done since before his arrest, as a server's assistant in restaurants. Most recently, he has been working at Greywind, a new upscale restaurant near Hudson Yards, and this week he will start a second job working at the Roxy Hotel in Tribeca.

Application GRANTED. The Clerk of
Court is respectfully directed to terminate
Dkt. No. 116. SO ORDERED.

A handwritten signature in black ink, appearing to read "Alison J. Nathan".

April 24, 2023

Respectfully submitted,

Sarah M. Sacks